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BY ECF

Hon. Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

*8/7/22
The proposed schedule is attached*

Re: USA v. Paul Van Manen
18 Cr. 030 (PAC)

*As requested
Paul M. Kelly
L16v*

Dear Judge Crotty:

I am assigned counsel for Paul Van Manen in connection with his 28 U.S.C. § 2255 motion. I write to request additional time to file the motion on my client's behalf. I have read the extensive record in this matter, and am working on the motion. However, after investigation, including discussions with my client, I am in the midst of also pursuing several matters which are outside the trial record and which require investigation in order for a competent job to be performed. For these reasons, after consultation with the government (which has no objection to this application), it is respectfully requested that the briefing schedule be modified in this matter to permit the filing of Mr. Van Manen's papers by November 15; government response by December 16; and reply by December 27, 2022.

Thank you very much for your attention in this matter, and should the Court have any questions regarding the contents of this letter, it is respectfully requested the parties be contacted.

Sincerely,

Robert A. Soloway

Robert A. Soloway

RAS:sc